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May 24, 1996

William F. Caton, Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

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MAY 24 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: MM Docket Nos. 91-221/87-8

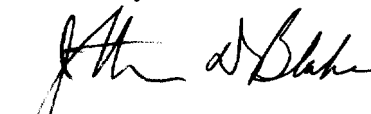
Dear Mr. Caton:

Providence Journal Company ("PJC"), pursuant to Section 1.1206(a)(2) of the Commission's rules, hereby notifies the Commission that its representatives met yesterday afternoon, in separate meetings, with Julius Genachowski, Esq., Chairman Hundt's Special Assistant, Jane Mago, Esq., Commissioner Chong's Senior Legal Advisor and David Siddall, Esq., Commissioner Ness's Legal Advisor.

PJC's representatives discussed its positions on duopoly and LMA issues. A summary of the benefits of LMAs (copy attached) was provided. The discussions related to matters in the Further Notice of Proposed Rulemaking in MM Docket Nos. 91-221, 87-8, FCC 94-322 (released January 17, 1995).

Please direct any inquiries concerning this matter to the undersigned.

Sincerely,


Jonathan D. Blake
Attorney for Providence
Journal Company

Enclosure

cc: Julius Genachowski, Esq.
Jane Mago, Esq.
David R. Siddall, Esq.

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OKY

As of November 20, 1995 (3:52pm)

LMAs INCREASE QUALITY AND QUANTITY OF LOCAL PROGRAMMING

ALABAMA

WTTO Channel 21, Birmingham, Alabama (UHF, Fox)
WABM Channel 68, Birmingham, Alabama (UHF, Paramount)

Prior to the LMA, syndicated children's television was not run on Channel 68. Now, shows such as "Bill Nye, The Science Guy," "Sing Me a Story" and "Jelly Bean Jungle" are airing. Locally produced PSAs are shared between both facilities allowing more of the local audience to see and hear information and referral provided by local service organizations. Plans currently call for Channel 68 to launch a newscast early next year.

ARIZONA

KMSB Channel 11, Tucson, Arizona (VHF, Fox)
KTTU Channel 18, Tucson, Arizona (UHF, UPN)

By entering into an LMA both Channel 11 and Channel 18 have increased the quality and quantity of their local programming. Since the LMA, Channel 18 has begun to carry more locally produced specials and public affairs programming. Now, local sports specials are produced several times a year and one hour of public affairs programming is being run including 30 minutes per week in prime time. Educational programming has increased from 30 minutes per week before the LMA to six hours per week presently. After the start of the LMA, as Fox programming increased on KMSB, the University of Arizona football and basketball programs moved from KMSB to KTTU, thus allowing these events to remain free over the air. In addition, such national and local telethons for Easter Seals and the Arthritis Foundation have been added.

CALIFORNIA

KCRA Channel 3, Sacramento, California (VHF, NBC)
KSCH Channel 58, Stockton, California (UHF, Independent)

In addition to carrying the 10 p.m. local news, KSCH was able to run continuous coverage of the O.J. Simpson trial. Since entering into the LMA with KCRA, 164 hours of programming are run per week on KSCH, including syndicated programming that KCRA cannot carry. KCRA also invested in plant and equipment which produced 100 percent power transmission for KSCH for the first time in over a year.

KMPH Channel 26, Visalia, California (UHF, Fox)
KGMC Channel 43, Clovis, California (UHF, Independent)

Prior to the LMA with KMPH, KGMC's programming consisted of only rock music videos, now KGMC is providing news and entertainment programming.

FLORIDA

WBBH Channel 20, Ft. Myers, FL (UHF, NBC)
WEVU Channel 26, Bonita Springs, FL (UHF, ABC)

As the bottom-rated television station in the market for more than ten years, WEVU could not afford a real news department. An LMA with WBBH, however, provided WEVU the opportunity to provide in-depth local news coverage for the first time. During last year's election, WEVU broadcasted from election headquarters and candidates homes, and sent crews and satellite trucks to cover the governor's race and Senator Connie Mack's re-election bid. Without the LMA, this amount of coverage would not have been possible.

HAWAII

KHNL Channel 13, Honolulu, Hawaii (VHF, FOX)
KFVE Channel 5, Honolulu, Hawaii (VHF, UPN)

Due to the LMA, KFVE, Channel 5 now provides in-depth local news coverage seven days a week in prime time (9-9:30 p.m.). The University of Hawaii men and women's collegiate sports events are locally produced and broadcast solely on KFVE, accounting for over 500 hours and 125 live sporting events per year. Channel 5 has also added "Hot Hawaiian Nights," a weekly prime time program featuring local music and musicians and focusing on the culture of Hawaii.

KENTUCKY

WDRB Channel 41, Louisville, Kentucky (UHF, Fox)
WFTE Channel 58, Salem, Indiana/Louisville, Kentucky (UHF, Paramount)

Tom Ledford struggled to find a loan, but no bank thought the station would be profitable enough to risk financing. However, an LMA agreement with WDRB-Louisville suddenly made WFTE an attractive investment. With a WFTE financing guarantee, the station received financing, and went on the air in a short period of time. WFTE competes with and differentiates itself from the seven other television stations in its market by broadcasting independent and syndicated programming, as well as live university basketball and football games not carried by the networks or cable channels.

MARYLAND

WBBF Channel 45, Baltimore, Maryland (UHF, Fox)
WNUV, Channel 54, Baltimore, Maryland (UHF, Paramount)

The LMA between WBBF and WNUV has resulted in locally produced programming of interest to the community. Recently, a town meeting with Governor Glendening and youth from across Maryland was jointly produced and aired. Partnership between WBBF, WNUV and the local business community has produced a public service campaign, "For Your Health: Partners in Prevention." This program, developed with a local hospital, focusses on wellness and preventative care health messages.

MICHIGAN

WOOD Channel 8, Grand Rapids, MI (VHF, NBC)
WOTV Channel 41, Battle Creek, MI (UHF, ABC)

In 1991, WOTV entered into an LMA with the NBC affiliate in Grand Rapids. WOTV is now producing local news programming at 6:00 p.m. and 11:00 p.m. In an effort to expand local coverage of the conflict in Bosnia, WOTV sent a reporter and photographer to Aviano, Italy to follow the local National Guard members as they flew support for the United Nations forces over Bosnia. Public affairs programming has been expanded through programs such as "Connections to the Future," a round table discussion with leaders of Battle Creek and Kalamazoo. The program, a joint cooperation between the two cities highlights industrial, educational and social growth.

NEBRASKA

KPTM Channel 42, Omaha, Nebraska (UHF, Fox)
KXVO Channel 15, Omaha, Nebraska (UHF, Independent)

KPTM advanced the funds for the construction of KXVO, which went on the air June 10th of this year. It is Omaha's fifth commercial station. No other means were available to the licensee of KXVO to construct and bring to the air a first class, powerful television service to the residents of eastern Nebraska and western Iowa.

NORTH CAROLINA

WLFL Channel 22, Raleigh, North Carolina (UHF, Fox)
WRDC Channel 28, Durham, North Carolina (UHF, UPN)

"Teen Talk," a weekly half hour program scheduled to air in January of 1996 is being developed jointly with WLFL and WRDC. Local teens will be guests on the show and personally address issues affecting their lives and community. "Eddie's Digest" is also in development for early 1996. This is a public service program hosted by the General Manager of the WRDC addressing issues of local and national significance.

OHIO

WCMH Channel 4, Columbus, Ohio (VHF, NBC)
WWHO Channel 53, Chillicothe, Ohio (UHF, Warner Brothers)

Channel 53 added locally-produced daily newscasts (the first 10 p.m. newscast in the area), totaling 3.5 hours a week. It also opened a news bureau in Chillicothe and is slated to begin producing weekly community affairs programs. PSA's are produced in-house and aired regularly. Another addition to Channel 53 has been the locally-produced "Kids 53" segments which air within children's programs between 6 a.m. to 9 a.m. and 3 p.m. to 5 p.m.

WOIO Channel 19, Cleveland, Ohio (UHF, CBS)
WUAB Channel 43, Cleveland, Ohio (UHF, independent/Paramount)

By entering into an LMA both Channel 19 and Channel 43 have increased their local programming. Channel 19 has been able to affiliate with CBS and has invested millions of dollars in initiating a new local news service, employing over 100 people and producing morning news inserts and two evening newscasts -- one at 6 p.m. and another at 11 p.m.

PENNSYLVANIA

WPGH Channel 53, Pittsburgh, Pennsylvania (UHF, Fox)
WPTT Channel 22, Pittsburgh, Pennsylvania (UHF, UPN)

Children's and educational television has increased due to the LMA. WPTT produces and airs "Scouting Today," an educational program demonstrating local boys and girls involvement in issues affecting their daily lives. In addition, WPTT through WPGH was able to air inserts to the Arthritis Telethon and Children's Miracle Network Telethon.

TEXAS

KXAN Channel 36, Austin, Texas (UHF, NBC)
KNVA Channel 54, Austin, Texas (UHF, Warner Brothers)

KNVA debuted the "5:30 News Report" in October, running five half hour shows per week. They provided complete live coverage and analysis of President Clinton's recent trip to Austin. "Kids Ideas" is a half hour weekly program produced by and starring a local 12 year old Hispanic girl. "KNVA Weather Minute" provides the current weather forecast every hour on the hour followed by live Doppler Radar.

KXAS Channel 5, Dallas/Ft. Worth, Texas (VHF, NBC)
KXTX Channel 39, Dallas/Ft. Worth, Texas (UHF, independent)

After entering into a LMA with KXAS, KXTX was able to pay all of its bills and regain financial footing. The station airs KXAS's 6 and 10 p.m. newscasts at 7 and midnight -- the first newscasts at those times in the Dallas/Ft. Worth area. On election night, wall-to-wall local election coverage was provided on KXTX. This was a first in the history of the market.

KABB Channel 29, San Antonio, Texas (UHF, Fox)
KRRT Channel 35, Kerrville, Texas (UHF, UPN)

As a result of the LMA, nightly prime time local newscast has been expanded from 30 minutes to one hour seven nights per week. The two stations combined provide more children's programming than the other three commercial stations combined on a weekly basis.

WISCONSIN

WCGV Channel 24, Milwaukee, Wisconsin (UHF, UPN)
WVTV Channel 18, Milwaukee, Wisconsin (UHF, Independent)

Through the LMA, WVTV has been able to develop and produce local programs of interest. "Good Cops" a community outreach campaign offered viewers a unique look at the positive and heroic efforts of police officers in Southeastern Wisconsin communities. "Teachers are Tops" recognizes the important role teachers have in the community. Teachers are selected from nomination letters written by area students, then featured on the program.